

2025 Report under the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*

Introduction

This report has been prepared by Trinity Western University (TWU) in respect of Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act* for our financial year ending April 30, 2025.

TWU recognizes the importance of promoting labour practices that protect the human rights of workers in Canada's supply chains, including preventing and mitigating the risks of forced labour and child labour. As a Christian university, our core values are to pursue truth and excellence with grace and diligence, treat people and ideas with charity and respect, think critically and constructively about complex issues, and willingly respond to the world's most profound needs and greatest opportunities.

Structure

Founded in 1962, TWU is a global Christian liberal arts university organized under the *Societies Act* and the *Trinity Western University Act* to offer liberal arts, sciences, and professional disciplines in business, nursing, education, human kinetics, graduate studies, and arts, media, and culture. TWU is chartered by the province of British Columbia to grant baccalaureate, master's and doctoral degrees. We are a not-for-profit entity and a registered charity. We are governed by a Board of Governors, the members of which are elected in accordance with our by-laws.

TWU's main campus and headquarters is in Langley. We also operate locations in Richmond-Lansdowne, and Richmond-Minoru, British Columbia, and Ottawa, Ontario.

Over 6,000 students enroll each year at TWU. We have 931 employees of which 383 are faculty (fulltime and part-time) and 548 are staff. Our fulltime faculty are unionized. We also employ approximately 390 students on short-term contracts per year to facilitate our operations of offices, libraries, labs, and other facilities, recognizing that on-campus employment can assist students in financial support, skills expansion, and experiences enrichment.

TWU is an active member of industry organizations and associations including BCNET, the Canadian Association of University Business Officers (CAUBO), Canadian Public Procurement Council (CPPC), and Campus Stores Canada (CPC).

Activities and supply chain

To support our academic and operational activities and campus life, TWU procures a variety of goods and materials, including research materials, education textbooks, clothing, gifts, and other supplies.

Through our Campus Store, on the Langley campus and online, we sell textbooks, trade books, university-branded clothing, gifts and supplies to our students. On our main Langley campus, we provide food service that is operated and sourced by a large, reputable Canadian food service and distribution company.

TWU is a member of BCNET, a not-for-profit, collaborative shared services organization that provides procurement services to 25 public post-secondary institutions, 16 research institutes and other higher

education institutions. Through BCNET, we have access to pre-screened product and service agreements that align with institutional procurement policies and confirm compliance with applicable laws. In addition, our membership in CAUBO, CPPC and CPC enable us to participate in industry organizations that advocate for the development of best practices in procurement.

TWU purchases goods from Canadian suppliers whenever possible. In this reporting year, most of the goods sold on campus and used in our operations were procured from Canadian vendors. Our imports are minimal in value and consist primarily of education materials, the majority of which are imported from the United States.

Steps taken to prevent and reduce risks of forced labour and child labour

In the reporting year, TWU's approach to preventing and reducing the risks of forced labour and child labour in our academic activities and operations, and supply chain was to continue to take the following steps:

- incorporate responsible and ethical business practices in our operations through our standards of conduct, our commitment to community, and our workplace policies,
- address supply chain risks by applying our Contract Signing Policy and participating in industry organizations, including BCNET, CAUBO, CPPC and CPC,
- conduct business with reputable Canadian suppliers, including a well-established food service and distribution company that has adopted a Supplier Code of Conduct in its operations, and
- encourage reporting of conduct that contravenes applicable laws and our policies.
- conduct an assessment of risks of forced labour and child labour in our organization's supply chain regarding imported goods.

Policies and due diligence

TWU has well-established policies and written commitments relating to ethical and value-based conduct and decision making.

Our faculty and employees are at all times guided by our **Statement of Faith** and **Community Covenant Agreement**. As well, our students sign a **Student Code of Conduct** as part of their commitment when studying at TWU. Our mission, core values, curriculum and community life are formed by a firm commitment to the person and work of Jesus Christ as declared in the Bible. The Community Covenant is a solemn pledge in which our employees place themselves under obligations to, *inter alia*, demonstrate concern for others, treat all persons with respect and dignity, and be responsible citizens both locally and globally who respect authorities, submit to the laws of our country, and contribute to the welfare of creation and society.

In our academic activities and operations, we comply with Canadian employment, labour, human rights, and safety laws and regulations. Our relationship with approximately half of our faculty is governed by the terms of a collective agreement that expressly require us to provide a healthy and safe workplace, to consult the union to improve hiring procedure, and to engage compensation specialists to evaluate our compensation system.

We have adopted policies to protect the health and safety of our faculty, employees, and students, including:

- a **Health and Safety Policy** that enables a consistent, efficient, and effective approach to risk identification, assessment and response to prevent, reduce and eliminate hazards in our campuses. We

educate our new employees of our general and specific safety policy through orientations and onboarding trainings.

- a **Student Employment Handbook** that requires onboarding trainings for our student employees to ensure the labour rights protection and compliance with our Occupational Health and Safety requirements.
- an independent office to provide both in-person and online education and training for our **Bullying, Harassment and Sexualized Violences Policy** on campus to faculty, staff and students. The Policy allows report of any incidents and provides supporting resources to our employees.
- a **Whistleblower Protection Policy** that encourages our employees to report any incidents of misconducts, unlawful activities, or other accountability concerns and protects our employees, contractors, service providers and any other individuals from any form of retaliation for providing the disclosures.
- a **Workplace Violence Policy** to minimize and prevent violence and unacceptable behaviour in our workplace. We demonstrate zero tolerance to any forms of violence in our campuses.

In our supply chain, TWU has adopted a **Contract Signing Policy** that applies to the procurement of goods, equipment, and services in our operations and programs. This Policy provides procedures for our officers to enter into business agreements with suppliers, ensuring our compliance with the regulation of use of funds and high standards of business ethics.

Given that TWU sells and imports only a small volume of goods each year, we have limited influence and leverage over the global supply chain. However, our continued participation in BCNET and other industry organizations that advocate for the development of services and best practices in procurement enables TWU to support and promote responsible and ethical supply chain and procurement practices.

Assessing risks of forced labour and child labour

To date, TWU has not identified risks of forced labour or child labour in our academic and operational activities. We operate in accordance with applicable laws and collective agreements that protect the rights of workers, including protection from unsafe working conditions, workplace violence, underage work, and other conditions that are indicators of forced labour and child labour.

We have not identified risks of forced labour and child labour in our direct supply chain. We procure goods for our operations and programs, primarily from Canadian suppliers who are also required to comply with laws protecting the rights of workers. We import a limited number of goods into Canada. Through BCNET, we have access to pre-screened products that comply with relevant laws and regulations in respect of sustainability and human rights protection.

Our food service provider has adopted a Supplier Code of Conduct that establishes ethical standards over its supply chain, including a commitment to the human rights of workers. We rely on this reputable Canadian company to establish due diligence processes to ensure that this code of conduct is respected in its extended supply chain.

Remediation measures and remediation of loss of income

TWU has established remediation processes that enable our employees to report conduct is in contravention of applicable laws and our policies. Our Whistleblower Protection Policy protects and encourages reporting by employees who have reason to believe that there has been a contravention of any law or that any wrongdoing has been (or is about to be) committed. Employees can report without fear of reprisal.

TWU is not aware of any incidents or reports of forced labour or child labour in respect to our operations or supply chain, and as such, has not taken any remediation measures or remediation of loss of income to families as a result of forced labour or child labour.

Employee training

TWU provides training to our employees (including student employees) relating to health and safety and human rights on our campuses as required by applicable laws and our collective agreements. To date, we have not developed training specifically related to forced labour and child labour in our supply chains.

Assessing the effectiveness of our approach

TWU has established measures to assess in our operations and monitor compliance of our workers, contractors and suppliers with the standards set out in our *Health and Safety Policy*. Beyond our safety assessments, to date we have not adopted specific assessment mechanisms to assess measure and track the effectiveness of steps taken to prevent or reduce the risks of forced labour or child labour.

Approval and attestation

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

Dated in the Township of Langley, British Columbia, this 27th day of May, 2025.



Dr. Todd F. Martin, President

I have the authority to bind Trinity Western University